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Attorneys for Plaintiff Pacific Information Resources, Inc.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

Pacific Information Resources, Inc., a  
 California Corporation,

Plaintiff,

vs.

SIMPLE COMMUNICATIONS, an Alabama  
 corporation; WILLIAM TRAVIS SULLIVAN,  
 individually, AND DOES 1 through 100,  
 inclusive, WHOSE IDENTITIES ARE  
 UNKNOWN,

Defendants.

**CASE NO. CV-07-4131 MMC**

**[Before the Honorable Maxine M.  
 Chesney, Courtroom 7]**

**REQUEST FOR JUDICIAL NOTICE IN  
 SUPPORT OF PLAINTIFF'S  
 APPLICATION FOR DEFAULT  
 JUDGMENT BY COURT**

[Filed concurrently with Plaintiff's  
 Application for Default Judgement by Court,  
 Memorandum of Points and Authorities in  
 Support Thereof, Declaration of Konrad L.  
 Trope, Declaration of Timothy J. Koster,  
 Declaration of Expert Hayden Bond,  
 Declaration of Expert Ran Hadas, Ph.D. and  
 [Proposed] Order Lodged Concurrently  
 Herewith]

Complaint Filed: August 9, 2007  
 Default Entered: October 2, 2007

**TO EACH PARTY AND THE ATTORNEY OF RECORD FOR EACH PARTY:**

Plaintiff Pacific Information Resources, Inc. ("Plaintiff" or "Pacific") hereby respectfully requests Judicial Notice of documents already on file with this Honorable Court pursuant to Federal Rules of Evidence 201 as follows:

1. Exhibit "1": True and Correct copy of June 30, 2006 Consent Judgment in the amount of \$390,225.00 and Permanent Injunction against Airon Corporation, Alexei Borisov and Levon Gasparian in *Columbia Pictures, et. al. v Airon Corporation, et. al.*, Case No. 05-CV-8698 (S.D.N.Y.).

2. Exhibit "2": True and correct copy of the Order Entering Permanent Injunction against Defendants Airon Corporation, Gasparian and Borisov and related persons pursuant to Fed. R. Civ. P. 65(d) in the case of *Microsoft Corporation v Airon Corp., Levon Gasparian and Alexei Borisov*, Case No. 2:06-CV-327 ORD (W.D. Wash.).

Plaintiff Pacific respectfully requests that the Court take Judicial notice of those documents within its own files as well as those official Court documents contained in the files of other judicial departments, which are attached hereto, as these documents constitute official judicial records and thus should overcome any potential hearsay objections.

Respectfully submitted,

DATED: February 27, 2008

**NOVO LAW GROUP, P.C.**

BY: /s/Konrad L. Trope, Esq.  
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Attorneys for Plaintiff PACIFIC  
INFORMATION RESOURCES,  
INC.

**PROOF OF SERVICE**

I am employed in the County of Orange, State of California in the office of a member of the Bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within action; my business address is: **4631 Teller Avenue, Suite 140, Newport Beach, California 92660.**

On **February 28, 2008**, I served the foregoing document described as:

**REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFF'S APPLICATION FOR DEFAULT JUDGMENT BY COURT**

on the interested parties in this action by placing ☐ the original ☒ a true copy thereof enclosed in a sealed envelope addressed as follows:

***SEE ATTACHED SERVICE LIST***

**XX BY MAIL:** I deposited such envelope in the mail at Irvine, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

**BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the addressee at the address on the attached Mailing List.

**BY FEDEX:** I deposited such envelopes at Irvine, California for collection and delivery by Federal Express with delivery fees paid or provided for in accordance with ordinary business practices. I am "readily familiar" with the firm's practice of collection and processing packages for overnight delivery by Federal Express. They are deposited with a facility regularly maintained by Federal Express for receipt on the same day in the ordinary course of business.

**BY FACSIMILE:** I transmitted the foregoing document by facsimile to the party(s) identified above by using the facsimile number(s) indicated. Said transmission(s) were verified as complete and without error.

**BY INTERNET/E-MAIL:** I transmitted the foregoing document by e-mail to the party(s) identified above by using the Internet Protocol Addresses indicated. Said transmission(s) were verified as complete and without error.

**BY INTERNET/E-MAIL WITH CLERK OF THE COURT:** I certify that on 2/27/2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing as indicated on the attached Mailing List.

1 I certify and declare under penalty of perjury under the laws of the State of California that  
2 the foregoing is true and correct.

3 Executed on **February 28, 2008** at Irvine, California.

4 /s/  
J. Renée Nordyke

***SERVICE LIST:***

*Pacific Information Resources v Simple Communications, et. al.*  
Case No. C-07-4131 MMC

**VIA U.S. MAIL**

William Travis Sullivan  
4931 Mason Road  
Clayton, Washington 99110

Simple Communications  
4931 Mason Road  
Clayton, Washington 99110

Simple Communications  
701 22nd Avenue  
Tuscaloosa, Alabama 35401